

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF REZA MIRZAIE IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S MOTION TO COMPEL
CERTAIN SAMSUNG DOCUMENTS AND DEPOSITION TESTIMONY**

1. I, Reza Mirzaie, declare as follows:

2. I am counsel for Headwater Research, LLC (“Headwater”) in the above-captioned matter. I provide this declaration in support of Headwater’s Motion to Compel Certain Samsung Documents and Deposition Testimony. I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently thereto.

3. Attached as Exhibit 1 is a true and correct copy of excerpts from Samsung’s Fourth Supplemental Responses to Headwater’s First Interrogatories, dated May 9, 2025.

4. Attached as Exhibit 2 is a true and correct copy of excerpts from Mobile Application Distribution Agreement, dated June 23, 2014.

5. Attached as Exhibit 3 is a true and correct copy of excerpts from Google Mobile Revenue Share Agreement, dated November 11, 2020.

6. Attached as Exhibit 4 is a true and correct copy of excerpts from Headwater’s Second Set of Interrogatories, dated September 13, 2024.

7. Attached as Exhibit 5 is a true and correct copy of excerpts from Headwater’s 30(b)(6) Notice to Samsung, dated February 21, 2025.

8. Attached as Exhibit 6 is a true and correct copy of excerpts from SAM-HW00155606.

9. Attached as Exhibit 7 is a true and correct copy of excerpts from SAM-HW00688292.

10. Attached as Exhibit 8 is a true and correct copy of excerpts from SAM-HW00690069.

11. Attached as Exhibit 9 is a true and correct copy of excerpts from SAM-HW00155560.

12. Attached as Exhibit 10 is a true and correct copy of excerpts from Headwater's Infringement Contention Claim Chart for the '918 Patent, dated May 15, 2024.

13. Attached as Exhibit 11 is a true and correct copy of excerpts from the Rough Transcript of the Deposition of Daniel Durig, dated May 15, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 16, 2025 in Los Angeles, California.

/s/ Reza Mirzaie
Reza Mirzaie